



Attorneys at Law

L'Abbate, Balkan, Colavita & Contini, L.L.P.3 Huntington Quadrangle, Suite 102S, Melville, New York 11747
T.516.294.8844 F.516.294.8202
www.lbcclaw.com

William T. McCaffery

Partner

wmccaffery@lbcclaw.com

Writer's Direct Dial

(516) 837-7369

June 20, 2025

Application granted. I do not anticipate granting further extensions absent good cause shown.

The Clerk of Court is respectfully requested to terminate ECF 89.

Date: June 23, 2025
New York, NY

SO ORDERED

ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

Re: *David Klein v. Farva Jafri, Jafri Law Firm,
 Mykola Ishchuk, Esmeralda Famutimi*
 Docket Nos. : 1:24-cv-01649
 1:25-cv-03135
 Our File No. : 169L-108515

Dear Judge Tarnofsky:

The undersigned represents the defendants, Farva Jafri, individually and incorrectly sued herein as Jafri Law Firm, Mykola Ishchuk, and Esmeralda Famutimi, in the above referenced actions.

Pursuant to this Court's Order of May 29, 2025, defendants' answer in the transferred California action (Docket No. 1:25-cv-03135) is due to be served on Monday, June 23, 2025 and the pre-answer motion to dismiss the original New York action (Docket No. 1:24-cv-01649) is due to be served on Thursday, June 26, 2025. This letter is written to request an extension of time to answer in the transferred California action and to move in the original New York action.

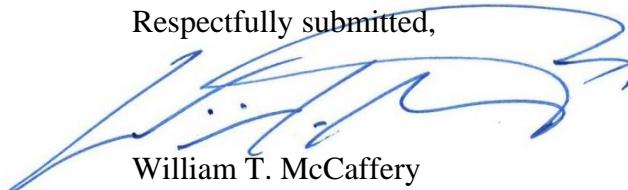
Magistrate Judge Ona T. Wang has been assigned to this case for settlement purposes and has scheduled a preliminary settlement conference call for Thursday, June 26, 2025 at 4:00 p.m. It is anticipated that a settlement conference of the case will be scheduled during that conference call. As a settlement conference of this case is likely to be held shortly, it is respectfully requested that defendants' time to answer in the transferred California action (Docket No. 1:25-cv-03135) and to move in the original New York action (Docket No. 1:24-cv-01649) be extended until seven days after the settlement conference of this case. The extension of time is also requested and required because defendant, Farva Jafri, has been ill and was recently in the hospital.

- 2 -

The undersigned emailed plaintiff's counsel to seek his consent to this request, but as of the filing of this letter, I have not heard back from plaintiff's counsel.

Thank you for your consideration.

Respectfully submitted,



William T. McCaffery

cc: **Via ECF**
Carlos Jato, Esq.
LAW OFFICE OF CARLOS JATO
Attorney for Plaintiff